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November 29, 2001 Mr.

Burnett:

We appreciate the opportunity to examine and comment on the Project Identification Report for Montana Forest Highway 56 (Thompson River Road). In our telephone conversation, I mentioned that FRO would probably have objections to some aspects of the project. However, after a careful reading, we found that we concur with three-and-one-half of the four Project Objectives identified on page 22:

- We agree that consolidating the two current roads sandwiching the river would have a beneficial environmental effect. Judiciously siting one road would allow meanders and riparian vegetation to be restored, which would improve the hydrology, restore fish cover and reduce thermal gain.
- We agree that the bridges should be brought up to environmental and safety standards. Current single-lane bridges are not only safety hazards, but also contribute to river channel degradation by compressing flow.
- We also concur that a project goal should be the reduction in gravel road maintenance. This would not only save operational costs, but would reduce road erosion and stream sedimentation.

However, achieving these goals by paving the Thompson River Road to 45-55 mph design speed would create more environmental and wildlife management problems than it would solve. We believe that creating a fast, heavy traffic link between Highway 200 and Highway 2 would pose great risks to the hydrology and water quality of the Thompson River, would place additional stress on its tributaries and watershed, and would have a "wild card" effect on traffic patterns throughout western Montana. We are convinced that the salutary objectives stated in the PIR could all be realized by implementing current technology in chemically stabilized in-place processed aggregate road surfacing.

We strongly oppose the paving of the Thompson River Road because we believe it would have these far-reaching impacts:

- Induced traffic — the obvious utility of this road as a short-cut between Highway 200 and Highway 2 would make it attractive to much of the heavy truck traffic between Spokane and Kalispell and northern Montana. This appeal is compounded by the recently paved connection between Murray, ID and Thompson Falls.
- Direct and Indirect impacts on wildlife — the combination of a wider, paved road configuration and the heavy traffic it would attract would cleave what is now an extremely remote and undeveloped area. Wildlife in this area, which not only includes game species but several ESA listed species, would be subject to well documented habitat degradation and fragmentation.
- Possible impacts on existing or potential populations of ESA threatened plant species.

## INDUCED TRAFFIC

The highway configuration envisioned in the PIR would attract not only freight, but also other heavy traffic. As noted in the PIR, the combined short cuts of Thompson Pass and Thompson River would attract market traffic from Spokane west to recreation destinations such as Glacier National Park and ski resorts in northwest Montana. This same time and distance savings would also apply to many of the approximately 2,000 trucks per day that currently use different routes between Spokane and Kalispell. The truck percentages of the latest ADT between Missoula and Kalispell math out to about 1500 trucks per day, and using the same formula we can estimate that 400 trucks per day use Highway 200 east of Thompson Falls. We can assume that Highway 2 east of Libby contributes at least another 100.

Understanding accurately how many trucks might use a paved Thompson River Road would require an extensive origin-destination study, but it can be assumed that the number will be significant considering the advantages of such a route. We are concerned that the 2025 forecast contained in the PIR of 525 ADT of which 30 would be trucks is a dangerous underestimation.

Paving the Thompson River Road would also have the effect of increasing residential and seasonal-recreational development along the river and its tributaries by increasing access and decrease commuting times. Although the southern portion of the project has some protection under mitigation agreements with the major landowner on the east side of the river, there are two small communities, several tracts along the river and its tributaries and large holdings near Highway 2 that would be vulnerable to development.

## DIRECT AND INDIRECT IMPACTS ON WILDLIFE

The Thompson River bisects an 80 by 40 mile block of lightly settled, largely undeveloped lands connecting the Mission Valley west of Highway 93 to the Cabinet Mountain Wilderness Area. The southern edge of this prime wildlife linkage corridor is bounded by Highway 200, which is faced by rugged scarps along the Clark Fork and Flathead Rivers. Highway 2 marks the northern edge as it weaves among the lakes and hills of the Thompson-McGregor area. This area abounds with several ESA listed species such as wolves, lynx, and bull trout. And it is recognized as a vital link between isolated populations of grizzlies in the Cabinet, Yaak and Selkirks with the bears from the Missions and Northern Rockies Ecosystem. If this area is not managed as a wildlife migration corridor, it would deprive marginal populations of the opportunity for recruitment and genetic variation.

Furthermore, the Interagency Grizzly Recovery Team has recently identified two of the most important grizzly linkage zones as bordering the Thompson River to the west (Highway 200 west of Thompson Falls and Interstate 90 west of St. Regis). It seems apparent that the intrusion of a heavily used asphalt barrier through the middle and along the flank of those vital corridors would have a significant negative effect on grizzly recovery.

Ironically, at the same time the Lolo National Forest is seeking to build a highway through known grizzly habitat, it is looking elsewhere in the forest for roads to obliterate as part of a mandated mitigation plan to redress past damage to grizzly habitat.

Wolves, another ESA listed species, are also documented residents of the Thompson River drainage. Like grizzlies, wolves are known to avoid heavily traveled paved roads. It is clear that this project

could fragment the useable habitat along the Thompson River and would have a chilling effect on pioneering habitats to the west.

Although there is little information on **lynx** in the Thompson River area, biologists suspect there is a resident population there and that the drainage on both sides of the river has abundant high-value habitat. It would be a travesty to impose the kinds of impacts this project would entail on lynx just months after its formal recognition as a threatened species.

The Thompson River and its precarious trout fisheries are already listed by the State of Montana as an Impaired Waterway. The River has a long history of low summer flows due to degradation of the watershed and high water temperatures caused by the low flows and exposure of the banks. The presence of a 30-foot wide strip of hydrocarbon asphalt within feet of the riverbank and the probability of accidental spillage from road construction and freight traffic would pose excessive risks to the already marginalized river. Any event, chronic or acute, could easily destroy the rivers fragile **bull trout and cutthroat trout** populations. This threat is another irony of this project in that the same area is part of Plum Creek's HCP for bull trout.

#### POTENTIAL ESA THREATENED PLANT POPULATIONS

The Thompson River offers habitats that could harbor Water Howellia, Ute Lady's Tresses and/or Spalding's Catchfly, all of which are listed as threatened species under the ESA. Known distributions of each species suggest that careful inventory is warranted in the Thompson River area.

- Water Howellia occurs east of Thompson River in the Swan River and to the west throughout Idaho and Washington in temporary ponds.
- Ute Lady's Tresses inhabit marshes similar to those along the Thompson River west and south of the project area.
- Spalding's Catchfly, a plant that remains dormant (i.e. "invisible") for many years until fire releases it, is found in dry foothills similar to those just off the river bottom. This species' distribution encircles the Thompson River area.

These and other sensitive plants such as Clustered Ladyslipper could be seriously impacted by both construction and the attendant development that will inevitably follow paving.

#### AN ALTERNATIVE RECOMMENDATION—NATIVE AGGREGATE SURFACE

Considering the low utility to current users of the road and excessively high costs and environmental impacts of this project, we urge that pavement be eliminated from the study plan. Instead, we propose that the general layout of the alignment and the projected additions and improvements to bridges proposed in the PIR be retained, but that pavement be substituted with treated native surface.

In the past decade there has been significant improvement in the suitability and durability of native aggregate surfacing. Chemical treatment with calcium chloride and other compounds combined with special handling have been shown to produce firm, safe, dust- and erosion-resistant, enduring forest roads. Recent experiments with forest roads in Idaho, Wyoming, Alaska, and Montana (Copper Creek

in the Helena National Forest) have shown that the combination-of deep chemical and mechanical treatment can produce surfaces that last for years with minimal maintenance.

The Copper Creek Road was treated with calcium chloride at a rate of 4.2 pounds per square yard to a depth of 2.5 inches using a mobile in-place processor. The results were significant reductions in dust and slump, and a surface that was maintenance free for over two years.

Other chemically enhanced processes such as magnesium chloride brine have also shown promise and should be included in an alternatives review of this project.

Clearly, these surfacing processes would meet the principle goals outlined in the PTR without the unwarranted risks entailed by paving the Thompson River Road.

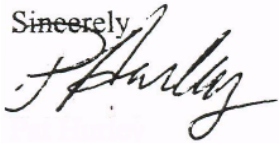
In summary, we would ask that the environmental review of this project carefully explore the following:

- Substitution of native or aggregate chemically processed surface for asphalt
- Conduct an in-depth origin-destination study designed to determine how much additional traffic, especially truck, would be induced by a paved Thompson River Road.
- Economic effects on the incorporated cities of Libby and Thompson Falls
- An inventory of private holdings along the Thompson River and its tributaries and a development risk assessment.
- Species specific studies on the effects of road configuration on game and ESA listed animals and plants (moose, elk, white-tail and mule deer, lynx, grizzly, wolf, bull trout, cutthroat trout, water Howellia, Ute lady's tresses, Spalding's catchfly, etc.).
- Impacts of configurations on the hydrology, water quality and habitat suitability of the Thompson River.
- Due to the regional significance of this project, the meeting schedule should include Missoula and Kalispell as well as Libby and Thompson Falls.

Please keep us informed about this project by contacting me via e-mail (patjiurley@skc.edu) and/or

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Sincerely,



Pat Hurley  
Chairwoman  
Flathead Resource Organization

Cc:

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